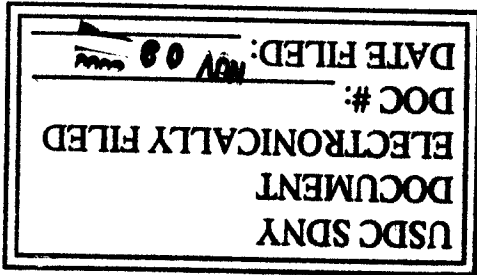


1. From at least in or about December 2003 through in or about July 2004, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodriguez," CHRISTINE RICHARDSON, and TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makevish," a/k/a "Eduardo Rodriguez," a/k/a "Cecilio Pena," the defendants, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.

The Grand Jury charges:

(Bank Fraud Conspiracy)

COUNT ONE



SI 05 Cr. 1067 (KMK)

SUPERSEDED INDICTMENT

UNITED STATES OF AMERICA
- v. -
DOUGLAS SHYNE,
NATASHA SINGH,
a/k/a "Beatris Rodriguez,"
CHRISTINE RICHARDSON,
NATHANIEL SHYNE,
TOYBE BENNETT,
a/k/a "Dmitriy Makarevich,"
a/k/a "Dmitriy Makevish,"
a/k/a "Eduardo Rodriguez,"
a/k/a "Cecilio Pena," and
ROBERTO MONTGOMERY,
Defendants.
x

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3. In furtherance of the conspiracy and to effect the illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, and TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makevish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," the defendants, committed the following overt acts, among others, in the Southern

OVERT ACTS

2. It was a part and an object of the conspiracy that United States Code, Section 1344. defendants defrauded Citibank and Bank of America (formerly Fleet Bank), among other banks, by depositing into accounts at those banks proceeds from a stolen check, in violation of Title 18, fraudulent pretenses, representations, and promises, to wit, the and control of, said financial institution, by means of false and securities, and other property owned by, and under the custody Corporation, and to obtain moneys, funds, credits, assets, which were then insured by the Federal Deposit Insurance artifice to defraud a financial institution, the deposits of would and did execute, and attempt to execute, a scheme and others known and unknown, unlawfully, willfully, and knowingly, Rodrigues," a/k/a "Cecilio Pena," the defendants, together with Makarevich," a/k/a "Dmitriy Makevish," a/k/a "Eduardo CHRISTINE RICHARDSON, and TOYBE BENNETT, a/k/a "Dmitriy DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues,"

New York and elsewhere, TOYBE BENNETT, a/k/a "Dmitriy
4. In or about November 2004, in the Southern District of

The Grand Jury further charges:
(Stolen Goods Conspiracy)

COUNT TWO

(Title 18, United States Code, Section 1349.)

DOUGLAS SHYNE.
Douglas NY Five Star Coffee, a business SINGH co-owned with
\$180,000, into the Bank of America (formerly Fleet) account of
RICHARDSON, in the total aggregate amount of approximately
checks drawn from the Citibank account of her mother, CHRISTINE
August 16, 2004, NATASHA SINGH deposited approximately four
d. Between on or about July 28, 2004, and on or about
\$200,000.
Stanley Account, in the total aggregate amount of approximately
Citibank account approximately four checks drawn from the Morgan
August 10, 2004, CHRISTINE RICHARDSON deposited into her own
c. Between on or about July 26, 2004, and on or about
Stanley Account").
deposited the check into a Morgan Stanley account (the "Morgan
b. On or about March 12, 2004, TOYBE BENNETT
York.
approximately \$775,000 (the "check") was stolen in New York, New
a. In or about March 2004, a check in the amount of

District of New York and elsewhere:

Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Eduardo
illegal object thereof, TOYBE BENNETT, a/k/a "Dmitriy
6. In furtherance of the conspiracy and to effect the

OVERT ACTS

Code, Section 2315.
were brought to New York, in violation of Title 18, United States
least approximately three vehicles in Florida, which subsequently
MONTGOMERY, and others used a counterfeit check to purchase at
stolen, unlawfully converted, and taken, to wit, BENNETT,
unlawfully converted, and taken, knowing the same to have been
and more, which have crossed a State boundary after being stolen,
wares, merchandise, securities, and money of the value of \$5,000
possess, conceal, store, barter, sell and dispose of goods,
unlawfully, willfully, and knowingly, would and did receive,
ROBERTO MONTGOMERY, the defendants, and others known and unknown,
Makarevich," a/k/a "Eduardo Rodriguez," a/k/a "Cecilio Pena," and
TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy
5. It was a part and an object of the conspiracy that

Section 2315.
United States, to wit, to violate Title 18, United States Code,
together and with each other to commit offenses against the
and knowingly did combine, conspire, confederate, and agree
defendants, and others known and unknown, unlawfully, willfully,
Rodriguez," a/k/a "Cecilio Pena," and ROBERTO MONTGOMERY, the
Makarevich," a/k/a "Dmitriy Makarevich," a/k/a "Eduardo

Rodriguez," a/k/a "Cecilio Pena," and ROBERTO MONTGOMERY, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere: a. In or about November 2004, TOYBE BENNETT sent a counterfeit check in the amount of approximately \$277,000 to Euro Motor Sports in Fort Lauderdale, Florida for the purchase of approximately three vehicles. b. In or about November 2004, ROBERTO MONTGOMERY picked up one of the vehicles at Euro Motor Sports that had been purchased with the counterfeit \$277,000 check. c. In or about November 2004, at least one of the vehicles purchased with the counterfeit check was brought to New York, New York. 7. In or about June 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodriguez," CHRISTINE RICHARDSON and NATHANIEL SHYNE, the defendants, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.

(Bank Fraud Conspiracy)

COUNT THREE

(Title 18, United States Code, Section 371.)

8. It was a part and an object of the conspiracy that DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, and NATHANIEL SHYNE, the defendants, together with others known and unknown, unlawfully, willfully, and knowingly, would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, said financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendants defrauded Commerce Bank and Citibank, among other banks, by depositing counterfeit checks and proceeds from such checks into accounts at those banks, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

9. In furtherance of the conspiracy and to effect the illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON and NATHANIEL SHYNE, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about June 8, 2005, a counterfeit check for approximately \$180,000 was deposited into the Commerce Bank account of NATHANIEL SHYNE, located in New York, New York.

b. On or about June 9, 2005, NATHANIEL SHYNE issued

owned by, and under the custody and control of, said financial moneys, funds, credits, assets, securities, and other property by the Federal Deposit Insurance Corporation, and to obtain a financial institution, the deposits of which were then insured execute, and attempt to execute, a scheme and artifice to defraud unknown, unlawfully, willfully, and knowingly, would and did NATHANIEL SHYNE, the defendants, together with others known and DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," and 11. It was a part and an object of the conspiracy that

Title 18, United States Code, Section 1344. commit an offense against the United States, to wit, to violate conspire, confederate, and agree together and with each other to unknown, unlawfully, willfully, and knowingly did combine, NATHANIEL SHYNE, the defendants, together with others known and DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," and August 2005, in the Southern District of New York and elsewhere, 10. From at least in or about July 2005 through in or about

The Grand Jury further charges:

(Bank Fraud Conspiracy)

COUNT FOUR

(Title 18, United States Code, Section 1349.)

RICHARDSON's Citibank account. approximately \$135,000, which checks were deposited into CHRISTINE RICHARDSON in the total aggregate amount of approximately two checks drawn from his Commerce Bank account to

institution, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendants defrauded Bank of America and Commerce Bank, among other banks, by depositing counterfeit checks and proceeds from such checks into accounts at those banks, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

12. In furtherance of the conspiracy and to effect the illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," and NATHANIEL SHYNE, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about July 25, 2005, a co-conspirator not named as a defendant herein ("CC-2") deposited into CC-2's Bank of America account approximately two counterfeit checks in the total aggregate amount of approximately \$153,000.

b. In or about August 2005, CC-2 issued approximately six checks drawn from CC-2's Bank of America account to a business co-owned by NATASHA SINGH and DOUGLAS SHYNE, in the total aggregate amount of approximately \$73,500.

c. In or about August 2005, CC-2 issued approximately three checks drawn from CC-2's Bank of America account to NATHANIEL SHYNE, in the total aggregate amount of approximately \$21,550, which were deposited into NATHANIEL SHYNE's Commerce

and realleged as if set forth fully herein.

14. The allegations set forth in paragraph 3 are repeated

The Grand Jury further charges:

(Money Laundering Conspiracy)

COUNT SIX

(Title 18, United States Code, Sections 1344 and 2.)

National Bank of Omaha accounts.

the fictitious identity of "Beatris Rodrigues," drawn on First Omaha, among other banks, by using a credit card and checks under promises, to wit, NATASHA SINGH defrauded First National Bank of by means of false and fraudulent pretenses, representations and and under the custody and control of such financial institution, funds, credits, assets, securities, and other property owned by, Federal Deposit Insurance Corporation, and to obtain moneys, institution, the deposits of which were then insured by the attempt to execute a scheme and artifice to defraud a financial defendant, unlawfully, willfully, and knowingly, did execute and elsewhere, NATASHA SINGH, a/k/a "Beatris Rodrigues," the November 2004, in the Southern District of New York and

13. From in or about December 2003 through in or about

The Grand Jury further charges:

(Bank Fraud)

COUNT FIVE

(Title 18, United States Code, Section 1349.)

Bank account, located in New York, New York.

16. It was a part and an object of the conspiracy that in or about December 2003 through in or about August 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, and TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved proceeds of specified unlawful activity, to wit, bank fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the

15. From at least in or about December 2003 through in or about August 2005, in the Southern District of New York and elsewhere, DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, and TOYBE BENNETT, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makervish," a/k/a "Eduardo Rodrigues," a/k/a "Cecilio Pena," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(1).

opened by TOYBE BENNETT, was deposited into the Citibank account of approximately \$87,600, drawn from the Morgan Stanley Account c. On or about April 26, 2004, a check in the amount

business co-owned by NATASHA SINGH and DOUGLAS SHYNE. (formerly Fleet) account of Douglas NY Five Star Coffee, a CHRISTINE RICHARDSON, were deposited into the Bank of America approximately \$180,000, drawn from the Citibank account of about August 16, 2004, approximately four checks, totaling b. From on or about July 28, 2004, through on or

of CHRISTINE RICHARDSON. opened by TOYBE BENNETT, were deposited into the Citibank account approximately \$200,000, drawn from the Morgan Stanley Account about August 10, 2004, approximately four checks, totaling a. From on or about July 26, 2004, through on or

District of New York and elsewhere:
committed the following overt acts, among others, in the Southern "Eduardo Rodrigues," a/k/a "Cecilio Pena," the defendants, a/k/a "Dmitriy Makarevich," a/k/a "Dmitriy Makevish," a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON, and TOYBE BENNETT, illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a 17. In furtherance of the conspiracy and to effect the

OVERT ACTS

1956(a)(1)(B)(i). ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section

or about June 2005 through in or about August 2005, in the

21. It was a part and an object of the conspiracy that in

1956(a)(1)(B)(1).

each other to violate Title 18, United States Code, Section

did combine, conspire, confederate, and agree together and with

others known and unknown, unlawfully, willfully, and knowingly

CHRISTINE RICHARDSON, and NATHANIEL SHYNE, the defendants, and

DOUGLAS SHYNE, NATASHA SINGH, a/k/a "Beatrice Rodriguez,"

August 2005, in the Southern District of New York and elsewhere,

20. From at least in or about June 2005 through in or about

The Grand Jury further charges:

(Money Laundering Conspiracy)

COUNT SEVEN

(Title 18, United States Code, Section 1956(h).)

and DOUGLAS SHYNE.

Douglas NY Five Star Coffee, a business co-owned by NATASHA SINGH

deposited into the Bank of America (formerly Fleet) account of

approximately \$35,000, drawn from CC-3's Citibank account, was

e. On or about June 2, 2004, a check in the amount of

and DOUGLAS SHYNE.

Douglas NY Five Star Coffee, a business co-owned by NATASHA SINGH

deposited into the Bank of America (formerly Fleet) account of

approximately \$47,230, drawn from CC-3's Citibank account, was

d. On or about May 12, 2004, a check in the amount of

of a co-conspirator not named as a defendant herein ("CC-3").

approximately two checks drawn from his Commerce Bank account to

b. On or about June 9, 2005, NATHANIEL SHYNE issued

account of NATHANIEL SHYNE, located in New York, New York.

approximately \$180,000 was deposited into the Commerce Bank

a. On or about June 8, 2005, a counterfeit check for

in the Southern District of New York and elsewhere:

the defendants, committed the following overt acts, among others,

"Beatris Rodrigues," CHRISTINE RICHARDSON, and NATHANIEL SHYNE,

illegal object thereof, DOUGLAS SHYNE, NATASHA SINGH, a/k/a

22. In furtherance of the conspiracy and to effect the

OVERT ACTS

18, United States Code, Section 1956(a)(1)(B)(1).

proceeds of specified unlawful activity, in violation of Title

location, the source, the ownership, and the control of the

in whole and in part to conceal and disguise the nature, the

to wit, bank fraud, knowing that the transactions were designed

which in fact involved proceeds of specified unlawful activity,

did conduct and attempt to conduct such financial transactions,

unlawful activity, unlawfully, willfully, and knowingly would and

financial transactions represented the proceeds of some form of

foreign commerce, knowing that the property involved in certain

unknown, in an offense involving and affecting interstate and

and NATHANIEL SHYNE, the defendants, and others known and

NATASHA SINGH, a/k/a "Beatris Rodrigues," CHRISTINE RICHARDSON,

Southern District of New York and elsewhere, DOUGLAS SHYNE,

CHRISTINE RICHARDSON, in the total aggregate amount of approximately \$135,000.

c. On or about July 25, 2005, a co-conspirator not named as a defendant herein ("CC-2") deposited into CC-2's Bank of America account approximately two counterfeit checks in the total aggregate amount of approximately \$153,000.

d. In or about August 2005, CC-2 issued approximately six checks drawn from CC-2's Bank of America account to a business co-owned by NATASHA SINGH and DOUGLAS SHYNE, in the total aggregate amount of approximately \$73,500.

e. In or about August 2005, CC-2 issued approximately three checks drawn from CC-2's Bank of America account to NATHANIEL SHYNE, in the total aggregate amount of approximately \$21,550.

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

23. As a result of committing one or more of the foregoing offenses alleged in Counts One, Three, Four and Five of this indictment, DOUGLAS SHYNE and NATASHA SINGH, a/k/a "Beatris Rodrigues," the defendants, shall forfeit to the United States pursuant to 18 U.S.C. § 982, any property constituting or derived from proceeds obtained directly or indirectly as a result of the fraud offenses, including but not limited to all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 708

Meade Court, Williamstown, NJ 08094.

Substitute Assets Provision

24. If the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due

diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the

Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which

cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. §

982(b), to seek forfeiture of any other property of said

defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1344.)

FOREPERSON

Mark Clark

MICHAEL J. GARCIA

Michael J. Garcia

United States Attorney

Nov. 9, 2005
Filed Superseding Indictment in SI 05 Cr 1067 (KMK)
Reason why

Foreperson.

Mike Blair

A TRUE BILL

MICHAEL J. GARCIA
United States Attorney.

(Title 18, United States Code, Sections 2, 371, 1344, 1349,
2315, 1956(a)(1)(B)(i), 1956(h).)
SI 05 Cr. 1067 (KMK)

SUPERSEDING INDICTMENT

Defendants.

DOUGLAS SHYNE, NATASHA SINGH,
a/k/a "Beatris Rodriguez," CHRISTINE
RICHARDSON, NATHANIEL SHYNE,
TOYBE BENNETT, a/k/a "Dmitriy Makarevich,"
a/k/a "Dmitriy Makervish," a/k/a "Eduardo
Rodrigues," a/k/a "Cecilio Pena," and
ROBERTO MONTGOMERY,

- v. -

UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK